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*Attorneys for General Motors LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	x	

**NOTICE OF FILING OF FIFTH SUPPLEMENT TO THE CHART OF PRE-CLOSING  
ACCIDENT LAWSUITS SET FORTH IN THE MOTION OF GENERAL  
MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE  
THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION  
AGAINST PLAINTIFFS IN PRE-CLOSING ACCIDENT LAWSUITS**

**PLEASE TAKE NOTICE** that on April 15, 2015, General Motors LLC filed the attached *Fifth Supplement to the Chart of Pre-Closing Accident Lawsuits Set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits* with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York  
April 15, 2015

Respectfully submitted,

/s/ Scott I. Davidson

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**FIFTH SUPPLEMENT<sup>1</sup> TO CHART OF  
PRE-CLOSING ACCIDENT LAWSUITS  
COMMENCED AGAINST NEW GM NOT LISTED  
IN MOTION TO ENFORCE**

	<b><u>Plaintiff</u></b>	<b><u>Date of Accident</u></b>	<b><u>Vehicle Year and Model</u></b>
1	Pillars <sup>2</sup>	November 23, 2005	2004 Pontiac Grand Am
2	Williams <sup>3</sup>	March 19, 2009	2003 Cadillac CTS

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<sup>1</sup> Pursuant to the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits* (the "Motion to Enforce") [Dkt. No. 12808-1], New GM reserved the right to supplement the list of Pre-Closing Accident Lawsuits set forth in the Motion to Enforce in the event additional cases were brought against New GM that implicate similar provisions of the Sale Order and Injunction. See Motion to Enforce, p. 7 n.6.

<sup>2</sup> The Action identified in the chart above is captioned *Pillars v. General Motors LLC* pending in the United States District Court for the Eastern District of Michigan, Northern Division (the "Pillars Action"). A copy of the complaint filed in the Pillars Action is attached hereto as Exhibit "A."

<sup>3</sup> The Action identified in the chart above is captioned *Williams v. General Motors, LLC* pending in the United States District Court for the Western District of Louisiana (the "Williams Action"). A copy of the complaint filed in the Williams Action is attached hereto as Exhibit "B."